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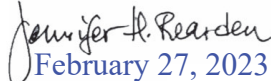
February 17, 2023

VIA ECF

Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Defendants' request is GRANTED. All deadlines in this case shall be stayed until May 8, 2023. Defendants' counsel shall promptly contact the assigned mediator to reschedule the March 21, 2023 mediation conference for a date no later than May 22, 2023. The Clerk of Court is directed to terminate ECF Nos. 28 and 30.

SO ORDERED.


February 27, 2023

Re: Ishtiaq Ahmed v. Richard Taylor, et. al.,
22-CV-08007 (VEC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Richard Taylor, Natasha Moseley-Jones, Viodelys Brathwaite, Anthony Nevandro, and Yevgeniy Belov (hereinafter "City Defendants") in the above-referenced action. City Defendants write to respectfully request that the Court stay the instant matter until May 8th, 2023 because the undersigned has been selected for jury duty. Plaintiff's counsel does not consent to this request.

By way of background, plaintiff alleges that, on June 25, 2021, plaintiff was arrested for committing an assault on Adil Khan which, based on CCTV video, never occurred. *See*, generally, Civil Docket ¶ 1. Plaintiff now brings claims for, *inter alia*, false arrest, fabrication of evidence, malicious prosecution, and excessive force. *Id.*

On February 9, 2023, the undersigned was selected for grand jury duty and, upon information and belief, will be engaged for three months - from February 14th, 2023 to May 5th, 2023. I am expected to be in Court every day during this time period, during the majority of the work day on most days, and will have limited access to my email.

City Defendants respectfully submit that plaintiff will not be prejudiced in any way if Your Honor is inclined to grant this request. The complaint in this case was filed on September 20, 2022. *See* Civil Docket ¶ 1. An answer was filed on December 16, 2022. *See* Civil Docket ¶ 26. Initial disclosures and limited discovery pursuant to the 1983 Plan have already been exchanged. Since

this is a Plan case, defendants respectfully submit that the only deadline implicated by this request is the upcoming Plan mediation currently scheduled for March 21, 2023¹.

As such, defendants respectfully request that the Court stay the instant matter until May 8th, 2023.² Thank you for your consideration herein.

Respectfully submitted,



Felix De Jesus
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **VIA ECF**
All attorneys of record

¹ Given the undersigned's jury duty schedule, the undersigned will not be available to attend the currently-scheduled March 21, 2023 mediation.

² Magistrate Judge Cheryl L. Pollack granted a similar stay request in the matter of *Ramsey Smith v. The City of New York*, et. al., 21-CV-4157 (HG) (CLP).